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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

CUSTODIA BANK, INC.,

Plaintiff,

v.

FEDERAL RESERVE BOARD OF
GOVERNORS and FEDERAL RESERVE
BANK OF KANSAS CITY,

Defendants.

No. 1:22-cv-00125-SWS

**DECLARATION OF ANDREW MICHAELSON IN SUPPORT OF DEFENDANT
FEDERAL RESERVE BANK OF KANSAS CITY'S REPLY IN SUPPORT OF ITS
CROSS-MOTION FOR SUMMARY JUDGMENT**

I, Andrew Michaelson, declare as follows:

1. Attached hereto as Exhibit 85 is a true and accurate copy of Julie Andersen Hill, *Bank Access to Federal Reserve Accounts and Payment Systems* (Univ. of Ala. Legal Studies Rsch. Paper No. 4048081, Mar. 30, 2022) (revised article published as *Opening a Federal Reserve Account*, 40 Yale J. on Reg. 453 (2023)).

2. Attached hereto as Exhibit 86 is a true and accurate copy of excerpts from the deposition of Tara Humston, dated November 3, 2023.

3. Attached hereto as Exhibit 87 is a true and accurate copy of excerpts from the deposition of Peter Conti-Brown, dated December 14, 2023.

4. Attached hereto as Exhibit 88 is a true and accurate copy of excerpts from the deposition of Caitlin Long, dated November 29, 2023.

5. Attached hereto as Exhibit 89 is a true and accurate copy of an email from Esther George with the subject line “RE: Call with Katherine Carroll – Avanti,” dated November 11, 2020, bearing the beginning Bates number FRBKC-00010471.

6. Attached hereto as Exhibit 90 is a true and accurate copy of a document with the title “Nontraditional Master Accounts and Wyoming SPDI [] Weekly Update,” dated September 4, 2020, bearing the beginning Bates number FRBKC-00015572.

7. Attached hereto as Exhibit 91 is a true and accurate copy of a handwritten document entered as Exhibit 237 in the November 16, 2023 deposition of the Federal Reserve Bank of Kansas City’s Rule 30(b)(6) witness.

8. Attached hereto as Exhibit 92 is a true and accurate copy of excerpts from the deposition of Judith Hazen as the Federal Reserve Bank of Kansas City’s Rule 30(b)(6) witness, dated November 16, 2023.

9. Attached hereto as Exhibit 93 is a true and accurate copy of excerpts from the deposition of Esther George, dated November 9, 2023.

10. Attached hereto as Exhibit 94 is a true and accurate copy of a document containing the Federal Reserve Bank of Kansas City's objections to Appendix A of ECF No. 295.

DATED this 23rd day of February 2024.

/s/ Andrew Michaelson
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CERTIFICATE OF SERVICE

I certify the foregoing *Declaration in Support of Defendant Federal Reserve Bank of Kansas City's Reply in Support of its Cross-Motion for Summary Judgment* upon all parties to this action pursuant to the Federal Rules of Civil Procedure via CM/ECF on February 23, 2024.

/s/ Shannon M. Ward
OF HIRST APPLGATE, LLP
Counsel for Defendant
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